



JOHN NAIMO  
AUDITOR-CONTROLLER

**COUNTY OF LOS ANGELES  
DEPARTMENT OF AUDITOR-CONTROLLER**

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May 26, 2015

TO: Supervisor Michael D. Antonovich, Mayor  
Supervisor Hilda L. Solis  
Supervisor Mark Ridley-Thomas  
Supervisor Sheila Kuehl  
Supervisor Don Knabe

FROM: John Naimo   
Auditor-Controller

SUBJECT: **JEWISH FAMILY SERVICE OF LOS ANGELES – A DEPARTMENT OF  
MENTAL HEALTH SERVICE PROVIDER – PROGRAM REVIEW**

We completed a program review of Jewish Family Service of Los Angeles (JFSLA or Agency), which included a sample of billings from Fiscal Year (FY) 2013-14. The Department of Mental Health (DMH) contracts with JFSLA to provide mental health services, including interviewing Program clients, assessing their mental health needs, and implementing treatment plans.

The purpose of our review was to determine whether JFSLA provided the services and maintained proper documentation, as required by their County contract.

DMH paid JFSLA approximately \$2 million on a cost-reimbursement basis for FY 2013-14. The Agency provides services in the Second Supervisorial District.

**Results of Review**

JFSLA's treatment staff had the required qualifications to provide DMH Program Services. However, the Agency overbilled \$394 (6%) of the \$6,231 in DMH Program billings reviewed and did not always comply with their County contract requirements.

Details of our review, along with recommendations for corrective action, are attached.

**Review of Report**

We discussed our report with JFSLA and DMH. JFSLA's attached response (Attachment II) indicates that they agree with our findings and recommendations. DMH will work with JFSLA to ensure our recommendations are implemented.

We thank JFSLA management and staff for their cooperation and assistance during our review. If you have any questions please call me, or your staff may contact Don Chadwick at (213) 253-0301.

JN:AB:DC:EB:nj

**Attachments**

c: Sachi A. Hamai, Interim Chief Executive Officer  
Dr. Marvin J. Southard, D.S.W., Director, Department of Mental Health  
Debby Barak, Board Chair, Jewish Family Service of Los Angeles  
Paul Castro, CEO and President, Jewish Family Service Los Angeles  
Public Information Office  
Audit Committee

**JEWISH FAMILY SERVICE OF LOS ANGELES  
DEPARTMENT OF MENTAL HEALTH  
PROGRAM REVIEW  
FISCAL YEAR 2013-14**

**PROGRAM SERVICES**

**Objective**

Determine whether Jewish Family Service of Los Angeles (JFSLA or Agency) provided the services billed to the Department of Mental Health (DMH) in accordance with their contract and related guidelines.

**Verification**

We selected 40 (4%) of the 966 approved Medi-Cal billings for January and February 2014, which were the most current billings available at the time of our review (November 2014). We reviewed the Assessments, Client Care Plans, Progress Notes, and Informed Consent forms in the clients' charts for the selected billings. The 40 billings represent services provided to 15 clients.

**Results**

JFSLA overbilled DMH \$394 (6%) of the \$6,231 in DMH Program billings reviewed. Specifically, the Agency overbilled:

- \$222 for five Targeted Case Management Services that did not have a Client Care Plan objective associated with it, as required by the DMH Provider's Manual. According to the DMH Provider's Manual, Chapter 1, Page 1-10, services for Targeted Case Management Services must be associated with a goal/objective(s).
- \$172 for a Crisis Intervention Service without documenting the need for the service as required by the DMH Provider's Manual. According to the DMH Provider's Manual, Chapter 2, Page 2-1, a Crisis Intervention note must include acuity of client or situation. The Agency explained the service should have been billed as a Mental Health Service.

In addition, the Agency needs to improve the quality of documentation in their Client Care Plans in accordance with their DMH contract requirements.

**Client Care Plans**

JFSLA did not complete two (13%) of the 15 Client Care Plans in accordance with their DMH contract. Specifically, two Client Care Plans did not contain objectives and planned interventions for each service billed as required by the DMH Provider's Manual. According to the DMH Provider's Manual, Chapter 1, Page 1-10, when Targeted Case

Management Services, Mental Health Services, and Medication Support Services are provided, they must be associated with a goal/objective(s).

**Recommendations**

**Jewish Family Service of Los Angeles management:**

- 1. Repay the Department of Mental Health \$394.**
- 2. Ensure Client Care Plans are completed in accordance with their Department of Mental Health contract.**

**STAFFING QUALIFICATIONS****Objective**

Determine whether JFSLA treatment staff had the required qualifications to provide the mental health services.

**Verification**

We reviewed the California Board of Behavioral Sciences' website and/or the personnel files for 15 (54%) of the 28 JFSLA treatment staff who provided services to DMH clients during January and February 2014.

**Results**

Each employee reviewed had the qualifications required to provide the billed services.

**Recommendation**

**None.**



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A family that serves.

May 04, 2015

John Naimo, Auditor-Controller  
Los Angeles County Auditor Controller  
350 South Figueroa Street, 8<sup>th</sup> Floor  
Los Angeles, CA 90071

Dear Mr. Naimo,

Please accept the following management response letter, in regards to the program review, conducted by your office, of Jewish Family Services of Los Angeles' Department of Mental Health provider services, including a sample of billings from Fiscal Year 2013-14.

The program review identified an overpayment of \$394 associated with five Targeted Case Management claims in which a Client Care Plan objective was not documented, and a single claim that had been inadvertently billed as a Crisis Intervention Service rather than a Mental Health Service. In addition, ensuring Client Care Plans be completed in accordance with the Department of Mental Health contract was recommended in the program review memo dated April 24<sup>th</sup>, 2015.

Jewish Family Service of Los Angeles is prepared to repay the County in the amount of \$394, and to ensure that Client Care Plans are completed in accordance with our Department of Mental Health contract; specifically, that all Client Care Plans include a Targeted Case Management Goal when a Targeted Case Management service has been provided. The following actions have or will be taken in response to this finding:

1. Based on the informal exit interview conducted on November 18, 2014, mental health clinicians received additional training in documentation of Targeted Case Management services and Client Care Plan objectives. As of November 2014, clinicians routinely prepare a Targeted Case Management Client Care Plan objective whenever Targeted Case Management services are provided.
2. The agency's quality assurance staff will review chart documentation to ensure that Client Care Plans contain objectives and planned interventions for each service billed.

We thank you for the opportunity to demonstrate the good work being done by our staff, and to improve our processes.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd Sosna", written over a horizontal line.

Todd Sosna, Ph.D.  
Senior Vice President of Operations